

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
DOCKET NO. 3:15-cv-00214-FDW-DSC

PGI POLYMER, INC.,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC., *et al.*,

Defendants.

PRELIMINARY INJUNCTION
BOND

KNOW ALL MEN BY THESE PRESENTS, that we, Plaintiff PGI Polymer, Inc. (“PGI”), as Principal, and Philadelphia Indemnity Insurance Company, as Surety, are held and firmly bound unto Defendants Church & Dwight Co., Inc. (“Church & Dwight”), Karmin Group a/k/a Le Groupe Karmin and Karmin Industries (collectively, “Karmin”), and BI-LO, LLC (“BI-LO”) (collectively, “Defendants”), in the sum of \$37,500 to be paid to Defendants upon proof of injury or damage to Defendants by reason of the Preliminary Injunction if it shall be finally determined that such Preliminary Injunction was wrongfully granted, which payment we bind ourselves, our successors and assignees, jointly and severally.

WHEREAS, PGI has obtained from this Court a Preliminary Injunction against Defendants, enjoining and restraining them from the commission of certain acts as set forth in the Order Granting Motion for Preliminary Injunction entered by the Honorable Judge Frank D. Whitney on October 9, 2015, upon the condition that Plaintiff gives security in the amount of \$37,500 to pay the costs and damages sustained by Defendants if they are found to have been wrongfully enjoined or restrained.

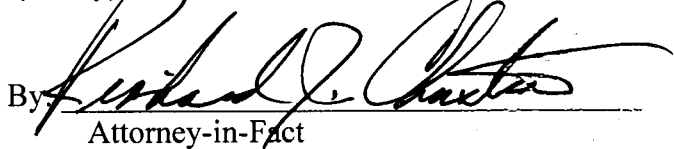
NOW, THEREFORE, the condition of this obligation is such that PGI shall pay Defendants such damages as they sustain by reason of the Preliminary Injunction, not to exceed \$37,500, if it shall be finally determined that such Preliminary Injunction was wrongfully granted.

SIGNED, SEALED, and DATED this the 20th day of October, 2015

A handwritten signature in black ink, appearing to read "Todd M. Hess", is written over a horizontal line.

PGI Polymer, Inc. (Principal)
By: Todd M. Hess, Senior Intellectual Property
Counsel

Philadelphia Indemnity Insurance Company
(Surety)

A handwritten signature in black ink, appearing to read "Richard J. Carter", is written over a horizontal line.

By: Richard J. Carter
Attorney-in-Fact



PHILADELPHIA INDEMNITY INSURANCE COMPANY

231 St. Asaph's Rd., Suite 100
Bala Cynwyd, PA 19004-0950

Power of Attorney

KNOW ALL PERSONS BY THESE PRESENTS: That **PHILADELPHIA INDEMNITY INSURANCE COMPANY** (the Company), a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, does hereby constitute and appoint: **Richard J. Christian; Elizabeth C. Christian of Insurance Management Co., Inc. T/A IMC Surety Solutions**

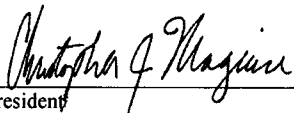
Its true and lawful Attorney (s) in fact with full authority to execute on its behalf bonds, undertakings, recognizances and other contracts of indemnity and writings obligatory in the nature thereof, issued in the course of its business and to bind the Company thereby, in an amount not to exceed \$7,500,000.00.

This Power of Attorney is granted and is signed and sealed by facsimile under and by the authority of the following Resolution adopted by the Board of Directors of PHILADELPHIA INDEMNITY INSURANCE COMPANY at a meeting duly called the 11th day of July, 2011.

RESOLVED: That the Board of Directors hereby authorizes the President or any Vice President of the Company to: (1) Appoint Attorney(s) in Fact and authorize the Attorney(s) in Fact to execute on behalf of the Company bonds and undertakings, contracts of indemnity and other writings obligatory in the nature thereof and to attach the seal of the Company thereto; and (2) to remove, at any time, any such Attorney-in-Fact and revoke the authority given. And, be it

FURTHER RESOLVED: That the signatures of such officers and the seal of the Company may be affixed to any such Power of Attorney or certificate relating thereto by facsimile, and any such Power of Attorney so executed and certified by facsimile signatures and facsimile seal shall be valid and binding upon the Company in the future with the respect to any bond or undertaking to which it is attached.

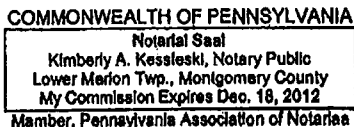
IN TESTIMONY WHEREOF, PHILADELPHIA INDEMNITY INSURANCE COMPANY HAS CAUSED THIS INSTRUMENT TO BE SIGNED AND ITS CORPORATE SEAL TO BE AFFIXED BY ITS AUTHORIZED OFFICE THIS 18TH DAY OF JULY, 2011.

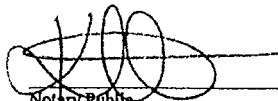


President

Christopher J. Maguire
President Philadelphia Indemnity Insurance Company, a Pennsylvania Corporation.

On this 18TH day of July 2011, before me came the individual who executed the preceding instrument, to me personally known, and being by me duly sworn said that he is the therein described and authorized officer of the **PHILADELPHIA INDEMNITY INSURANCE COMPANY**; that the seal affixed to said instrument is the Corporate seal of said Company; that the said Corporate Seal and his signature were duly affixed.

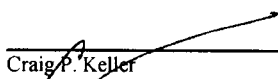




Notary Public

I, Craig P. Keller, Executive Vice President, Chief Financial Officer and Secretary of PHILADELPHIA INDEMNITY INSURANCE COMPANY, do hereby certify that the foregoing resolution of the Board of Directors and this Power of Attorney issued pursuant thereto on this 18TH day of July 2011 are true and correct and are still in full force and effect. I do further certify that Christopher J. Maguire, who executed the Power of Attorney as President, was on the date of execution of the attached Power of Attorney the duly elected President of PHILADELPHIA INDEMNITY INSURANCE COMPANY.

In Testimony Whereof I have subscribed my name and affixed the facsimile seal of each Company this 22nd day of October 20 15.



Craig P. Keller
Executive Vice President, Chief Financial Officer & Secretary
PHILADELPHIA INDEMNITY INSURANCE COMPANY